

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

MANUEL STAPLETON,

Plaintiff,

v.

CASE NO.: 2:13-cv-11848-SJM-LJM  
HON. STEPHEN J. MURPHY III  
MAG. JUDGE LAURIE J. MICHELSON

CITY OF MELVINDALE,  
OFFICER BRIAN BROWNING,  
BADGE #ME037

Defendants.

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**DEFENDANTS' WITNESS LIST and PROOF OF SERVICE**

**NOW COME** the Defendants, **CITY OF MELVINDALE AND OFFICER BRIAN BROWNING**, by and through their attorneys, **PLUNKETT COONEY**, and for their list of witnesses who may be called to testify at the trial of the above-entitled cause of action, state as follows:

1. Plaintiff, Manual Stapleton
2. Ofc. Hinojosa

3. Ofc. Browning
4. Lt. John Bajorek
5. Chief Chad Hayse
6. Ofc. J. Miller
7. Employees, agents, records custodian – Gene’s Towing
8. Past and future medical and/or psychological providers of Plaintiff
9. Daniel J. Grant, potential police expert
10. Terry Nerbonne, potential police practice expert
11. Dr. Harvey Ager, potential psychiatric expert
12. Agents, employees, records custodian – Wayne County Sheriff’s Department
13. Agents, employees, former employees, representatives and/or records custodian of City of Melvindale and the Melvindale Police Department
14. Agents, employees, former employees, representatives and/or records custodian of Park Urgent Care, 15101 Southfield Road, Allen Park, MI 48101
15. Defendants reserve the right to conduct an independent psychiatric evaluation of Plaintiff and to utilize the testimony of the health care provider performing such evaluation
16. Any and all witnesses identified by any other party to this litigation
17. Any and all necessary rebuttal witnesses
18. Any and all witnesses disclosed throughout the course of discovery including, but not limited to, answers to interrogatories, requests for

production of documents, requests for admissions and deposition testimony, including all exhibits

19. Any and all past and/or present treating physicians of Plaintiff and their records custodians

20. Defendants reserve the right to amend their list of witnesses as discovery proceeds

Respectfully submitted,

**PLUNKETT COONEY**

By /s/Audrey J. Forbush

AUDREY J. FORBUSH (P41744)

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Dated: August 13, 2013

**PROOF OF SERVICE**

STATE OF MICHIGAN            )  
  ) ss  
COUNTY OF GENESEE        )

AUDREY J. FORBUSH, first being duly sworn, deposes and says that on the 13<sup>th</sup> day of August, 2013, she caused to be served a copy of the enclosed DEFENDANTS' WITNESS LIST and PROOF OF SERVICE, via CM/ECF electronic filing with the United States District Court for the Eastern District of Michigan, Southern Division, which will provide notice of electronic filing to counsel of record.

/s/Audrey J. Forbush

AUDREY J. FORBUSH

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